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# ARNOLD & PORTER LLP

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555 Twelfth Street, NW  
Washington, DC 20004-1206

September 5, 2012

**VIA FEDERAL EXPRESS**

Honorable Jim Jones  
Acting Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 7101M  
Washington, DC 20460

*Jim*  
Dear Assistant Administrator Jones:

I write to follow up on my letter of April 20, 2012, concerning on-line sales to the general public of professional and agricultural rodenticides. *See* enclosed. We understand that agricultural and professional use rodenticide products that are in conformance with the Agency's Risk Mitigation Decision ("RMD") should not be sold in stores oriented toward residential consumers; however, we have become aware that such products are being made available in bulk quantities for consumer use through the internet. Although we have not yet received a response to our prior letter, we want to make you aware that sales of these products -- which are marketed in bulk quantities of up to 16 pounds -- continue, even as the Agency is considering cancellation of certain Reckitt Benckiser ("Reckitt") products to mitigate risks imputed to its small-volume consumer-use rodenticide products.

In addition to the websites identified in our previous correspondence, we have identified further instances of on-line retailers marketing bulk quantities of non-conforming rodenticides to consumers, without reference to tamper-resistant bait stations. For instance, 12-pound buckets of loose pelleted Jaguar Rodenticide are available on eBay for approximately \$70. *See* Enclosure 1. The active ingredient in Jaguar Rodenticide is brodifacoum, a second-generation anticoagulant -- of which sales to consumers in small quantities to consumers would be proscribed if EPA cancels Reckitt's small volume d-CON products because they do not conform with the RMD.

Similarly, on a website called [www.DoMyOwnPestControl.com](http://www.DoMyOwnPestControl.com) -- whose stated goal is to provide consumers "with the pest management solutions that professional pest control companies and exterminators use" -- members of the public can purchase a 16-

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Hon. Jim Jones  
September 5, 2012  
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pound bucket of Contrac place packs, which contains the second-generation anticoagulant, bromadiolone. *See* Enclosure 2. On-line reviews of this product make clear that it is to be purchased by consumers for household use, with reviewers commenting that they have placed this rodenticide “along our back fence,” “under the house,” “in the bird feeders on my deck,” “on top of my kitchen counter,” and in basements and attics. *See* Enclosure 3.

As we noted in April, continued on-line sales to the public of such products in bulk quantities undercuts the EPA’s stated public health and environmental goals, while calling into question the Agency’s rationale for considering cancellation of similar products sold only in small quantities in d-CON brand packages marketed by Reckitt.

We therefore renew our request that:

- 1). The Agency withhold any further action on the draft Notice of Intent to Cancel d-CON’s rodenticide products until the EPA reviews this situation and confers with stakeholders to find an appropriate solution;
- 2). The Agency investigate the sale of bulk rodenticides through on-line retailers to the general public and evaluate the extent to which these bulk sales are responsible for adverse human health and wildlife effects;
- 3). Based on the results of this evaluation, the Agency modify the RMD accordingly;
- 4). EPA consider taking action against the registrants if violations of FIFRA are occurring; and
- 5). We be kept apprised of the Agency’s investigation, findings, and other measures in this matter.

As you know, both Reckitt and the Agency’s FIFRA Scientific Advisory Panel have questioned the extent to which it is reasonable to attribute wildlife exposures to consumer-use rodenticides, such as d-CON brand products, that are sold in small quantity packages in retail outlets. Clearly, on-line sales of bulk quantities of such products are a more likely source of such exposures when compared to d-CON products sold in small quantity packages at retail.

Reckitt has been in contact with your staff to discuss new measures for d-CON brand products that Reckitt believes make it eminently possible to further reduce the opportunity for wildlife exposures while retaining appropriate consumer uses for small

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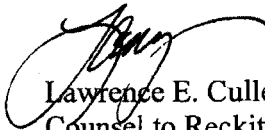
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September 5, 2012  
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quantity d-CON products. We would be pleased to continue working with your staff and look forward to further dialogue.

Sincerely,



Lawrence E. Culleen  
Counsel to Reckitt Benckiser LLC

Enclosures

cc: Hal Ambuter, Reckitt Benckiser  
Dr. Steven Bradbury, Office of Pesticide Programs  
Richard Keigwin, OPP/RRD  
Scott Garrison, OGC/OPP



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## Conrac Rodent Place Packs

★★★★★ Rating: 4.3

[Reviews \(23\)](#) | [Write a Review](#)

[Q&A's \(7\)](#) | [More Information](#)



Like 5

**\$129.00**

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Not for Sale to: AK

Indoor Outdoor

Size/Description	Price/Ea.	Qty
box(es)(291 x 25 gram packs)		
Buy 1: \$129.00 each	\$129.00	1
Buy 2 or more: \$120.00 each		

You May Also Need:

Select



[Trapper T-Rex Rat Trap](#)  
\$8.99

Total Price: \$129.00

**ADD TO CART**

Availability: Normally ships in 1 business day.

For large order quotes, please call us at 1-866-581-7378.

Description Customer Reviews (23) Product Q&A (7)

[Product Label](#)  
[Product MSDS](#)

Conrac place paks are a single feeding anticoagulant bait in pellet form that has superior acceptance by Mice and Rats. To use simply place Conrac place paks down where rodents travel. Rodent will gnaw through pak and ingest the poison.

**Active Ingredient:** [Bromadiolone .005%](#)

**Target pests:** Rats and mice

**For use in:** If unopened and sealed, product will last 2-3 years if kept away from extreme temperatures.

**Application:** Recommend changing bait out every 40-60 days if not eaten. Very cold or warm temperatures will mold or sour the bait faster.

**Pet safe:** Conrac is LESS toxic to non-target animals in both primary and secondary poisoning situations than other single-feeding baits. An antidote, Vitamin K1 is readily available and there is a time factor for treatment.

**Yield:** each pack is 25 grams

**NOT FOR SALE TO:** AK

**Documents:** [Product Label](#)  
[Product MSDS](#)

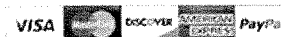
**Manufactured By:** Bell Labs

Active Ingredient: Bromadiolone .005%

**DESCRIPTION:** Conrac is a single feeding anticoagulant bait in pellet form that has superior acceptance by Mice and Rats. It is a pelletized bait made with an advanced formulation

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## Customers also bought



[Suspend SC](#)  
★★★★★

process that produces a fresher, better compressed pellet for improved weatherability. Contrac contains Bromadiolone, which is less toxic to non-target animals in primary and secondary poisoning than other chemicals.

**USE:** Simply Contrac place packs down where rodents travel. Rodent will gnaw through pack and ingest poison.

**NOT FOR SALE IN:** AK

Though rodents may consume a lethal dose in one feeding, bait shyness is not a problem because mortality occurs a few days after consumption. An antidote, Vitamin K1, is readily available and there is a time factor for treatment. Contrac are colored blue and authorized for use in federally inspected meat and poultry plants.

**SELECTION OF TREATMENT AREAS:** Determine areas where rats or mice will most likely find and consume the bait. Generally, these are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors and walls, or in locations where rodents or their signs have been seen. Protect bait from rain or snow. Remove as much alternative food as possible.

**APPLICATION DIRECTIONS:**

**RATS:** Apply 3 to 16 ounces of bait (usually at intervals of 15 to 30 feet) per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days or until signs of rat activity cease.

**HOUSE MICE:** Apply 1/4 to 1/2 oz. (1-2 level tablespoons) of bait per placement at 8- to 12-foot intervals. Larger placements (up to 2 oz.) may be needed at points of very high mouse activity. Maintain an uninterrupted supply of fresh bait for at least 15 days or until signs of mouse activity cease.

**RATS AND MICE:** Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and leftover bait properly. To prevent reinfestation, limit sources of rodent food, water, and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations and replenish as needed.

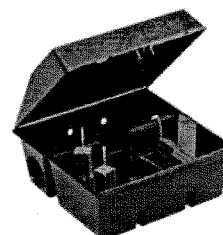
**\$40.50**



6 Protecta LP Rat Bait Stations + Bait Box

Protecta LP Rat Bait Stations CASE (6 stations) with Fastrac

★★★★★  
\$172.50



Protecta Rat Bait Station - CASE (6 stations)

**\$73.98**

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## Durvet Motomco Jaguar Rodenticide Pail 12 Pounds-31402

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Item  
condition: **New**

Quantity: 1 5 available

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99.7% Positive feedback

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Shipping: **FREE** - Standard Shipping | See all detailsItem location: **Lakewood, New Jersey, United States**Ships to: **United States** See exclusionsDelivery: Estimated between **Fri. Aug. 24 and Thu. Aug. 30**Payments: **PayPal**, Bill Me Later | See detailsReturns: **30 days money back, buyer pays return shipping** | Read details[Learn more](#)

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Description

Shipping and payments

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Seller assumes all responsibility for this listing.

Item number: 271029178796

Last updated on Aug 08, 2012 09:54:06 PDT [View all revisions](#)

## Item specifics

Condition: **New:** A brand-new, unused, unopened, undamaged item in its original packaging (where packaging is ... [Read more](#)

Model Number: 172258

Brand: DURVET

Manufacturer: DURVET





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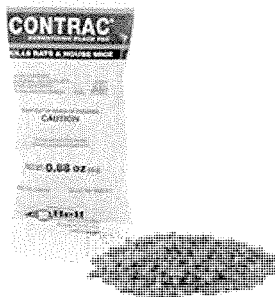
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## Conrac Rodent Place Packs

★★★★★ Rating: 4.3

[Reviews \(23\)](#) | [Write a Review](#)

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Like 5

**\$129.00**

Free Shipping!

Not for Sale to: AK

Indoor Outdoor

Size/Description

Price/Ea.

Qty

box(es)(291 x 25 gram packs)

Buy 1: \$129.00 each

Buy 2 or more: \$120.00 each

\$129.00

1

You May Also Need:

Select



[Trapper T-Rex Rat Trap](#)  
\$8.99

Total Price: \$129.00

ADD TO CART

Availability: Normally ships in 1 business day.

For large order quotes, please call us at 1-866-581-7378.

Description

Customer Reviews (23)

Product Q&A (7)

### Rating Snapshot

5 stars	16
4 stars	3
3 stars	1
2 stars	0
1 star	3

Average Customer Rating

★★★★★ (23 reviews)

write a review

Sort By: Most Helpful First

Search within this product's Reviews...

search

10 of 11 people found this review helpful:

★★★★★ Really works!!

By Michelle on August 23, 2005

Thank you for the [Conrac rat packs](#). I like to put them under the house and other places also. They kill the rats and don't leave a bad smell. It works really well.

Was this review helpful to you? ☒ Yes ☐ No

6 of 6 people found this review helpful:

★★★★★ Amazing

By Michael on August 10, 2010

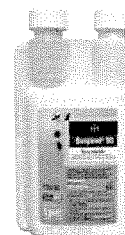
Ordered this on a Monday arrived on Wednesday, many dead mice by Friday. I did plenty of online homework and found this site. Prices are more than competitive. Service is nothing short of superb... very professional. As our Governor would say, "I'll be back!!"

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- Price Match Guarantee »
- 90 Day Return Policy »
- Professional Grade Products »



### Customers also bought



[Suspend SC](#)  
★★★★★

Was this review helpful to you? ☒ Yes ☐ No

5 of 5 people found this review helpful:

★★★★★ **Very good!**

By Rigobert on July 28, 2010

This is a very good product, it really works for me.

Was this review helpful to you? ☒ Yes ☐ No

5 of 5 people found this review helpful:

★★★★★ **contrac mouse poison**

By K. on October 14, 2010

It,s the best out there. Never fails , and good to just have in places in case something shows up.

Was this review helpful to you? ☒ Yes ☐ No

3 of 3 people found this review helpful:

★★★★★ **No title**

By no on July 9, 2010

We have a place in the country and have a rodent problem, this works great. Since they eat it and go off and feed their nests, we rarely have any die in the house. It is a product that works when you use it. I don't have it anywhere in the house open to our pets.

Was this review helpful to you? ☒ Yes ☐ No

3 of 3 people found this review helpful:

★★★★★ **Extremely Happy**

By Kim on May 12, 2010

I received the shipment in less than a week. Threw the unopened packs around my basement and a few days later went downstairs to see if the rats were eating the poison. To my surprise, some of the bags were gone entirely! Most were opened with some or a large portion of the pellets missing. I think my huge rat problem is just about gone! I highly recommend this product and the company.

Was this review helpful to you? ☒ Yes ☐ No

3 of 3 people found this review helpful:

★★★★☆ **So Far, So Good**

By Sayeeda on November 15, 2010

I've had the place packs down for one and one-half months and I can say that I have not seen any evidence of new mouse activity. They are odorless and harmless to humans. I would recommend this product to others without pets who need rodent control.

Was this review helpful to you? ☒ Yes ☐ No

3 of 3 people found this review helpful:

★★★★★ **Contrac Rodent Place Packs**

By Anna on August 6, 2010

We tried a local exterminator company, and no success. I was on the internet and found your website, and decided to try your product. My husband put the packets in areas where there were no pets or children, and where we saw the rats coming and going..... Within 3 - 5 days we noticed that the whole packet was gone.... and haven't seen a rat either!!!!!! Thank you!!!! I can go out my front door and not be afraid to run into a rat anymore....Highly recommend!!!!!!

Was this review helpful to you? ☒ Yes ☐ No

3 of 3 people found this review helpful:

★★★★★ **Contrac Rodent Place Packs**

By Gayle on May 3, 2010

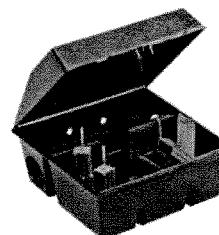
**\$40.50**



6 Protecta LP Rat Bait Stations + Bait Blox

Protecta LP Rat Bait Stations CASE (6 stations) with Fastrac

★★★★★  
\$47.50



Protecta Rat Bait Station - CASE (6 stations)

**\$73.98**

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**These products are not available in stores such as Home Depot, Lowes, Walmart or Ace Hardware. We accept VISA, MasterCard, American Express, Discover and PayPal Payments.**

These have really helped in getting rid of mice in the attic. I threw them all around into places not normally able to reach, and even dropped them in places I could reach. Nice that I don't have to worry about the poison spilling. I checked back after a few days to see if the mice had even noticed them. Many had been chewed on. Used a flashlight to check on the ones in far away places and could tell they had had activity and chewing. Had used a sticky board in one place and had two dead mice on it. Have not seen any evidence of mice in the house since putting these out. Hope I'm not jinxing it by saying that! :) I do recommend them and will buy more if needed.

Was this review helpful to you? ☒ Yes ☐ No

2 of 2 people found this review helpful:

★★★★★ **Effective Rodent Control**

By B. on October 9, 2010

A family of 5 rats discovered bird feeders on my deck and ate well every night. They avoided 2 types of traps with standard baits. Two days after placing Conrac packs and removing the bird seed, as recommended, the rodents discovered the packs and ate the contents. Within 24 hours, the rats were gone without odors. I now leave the bird feeders out overnight without a sign of the rats or other vermin.

Was this review helpful to you? ☒ Yes ☐ No

2 of 2 people found this review helpful:

★★★★★ **Conrac Rodent Place Packs**

By RD on August 18, 2010

I placed this on top of my kitchen counter on the sides where it can not be easily reached. I do not know how many rodents are there but so far I only saw 1. I saw 2 black pellets (which is the poop of the rodent) among the Conrac rodent pellets which is obvious that the rodent ate the pellets. After that I do not see rodent tracks anymore! When rodents eat this they die with no bad smell.

Was this review helpful to you? ☒ Yes ☐ No

2 of 2 people found this review helpful:

★★★★★ **Conrac Rodent Place Packs**

By Janet on August 12, 2010

A mouse was roaming about my attic and garage. I threw some packs in both areas and he is history. Love this stuff!

Was this review helpful to you? ☒ Yes ☐ No

2 of 2 people found this review helpful:

★★★★★ **Conrac Rodent Place Packs**

By Karen on July 22, 2010

I would recommend the above to anyone who has a rodent problem, especially rats. We had an infestation along our back fence and the rats were coming from several different directions and were out in middle of the day. We did research and found we could purchase the Conrac through DoMyOwnPestControl. We had in the past spent 3 times the money for a extermination company to come in and place the same Conrac Rat Packs and they lead us to believe we could not purchase this type of product ourselves but would have to go to a licensed exterminating company. If you have a rat problem then contact DoMyOwnPestControl. They are a great company and the customer service people are very helpful and friendly.

Was this review helpful to you? ☒ Yes ☐ No

2 of 2 people found this review helpful:

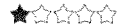
★★★★★ **Mice and Rat control**

By Torey on May 7, 2010

This formulation of poison is very attractive to the mice and its so well taken that the entire pack is eaten. The whole 15 grams completely devoured and instant elimination starts to begins.

Was this review helpful to you? ☒ Yes ☐ No

1 of 2 people found this review helpful:



### Conrac Rodent Place Packs

By Ellen on November 18, 2010

Not as good as the product it replaces. Mice used to go for the seeds. Now they eat these pellets only if there's nothing else.

Was this review helpful to you? ☐ Yes ☐ No

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